

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JAMES GOLDRING and GINA GOLDRING,

Plaintiffs,

-against-

**STIPULATION AND
ORDER OF
SETTLEMENT OF
ATTORNEY'S FEES**

DETECTIVE JASON ZUMO, Shield No. 11153, SERGEANT
GREG VALLERUGO, Shield No. 2315, DETECTIVE
WILLIAM CONNICK, Shield No. 1601, P.O. GONZALEZ,
P.O. JARED HOSPEDALES, Shield No. 3299, P.O.
PERULLO, Shield No. 5188, P.O. RIVERA, Shield No,
15436, P.O. RIPA, Shield No. 75264, P.O. STALLONE, Shield
No. 15897, P.O. CRUZ, Shield No. 3657, P.O. KERNY, P.O.
POST, Shield No. 2069, P.O. CARBONE, P.O. DILLON
SHIMANSKY, Shield No. 12499, P.O. SHORE, P.O.
MATTHEW VORRARO, Shield No. 15194, P.O. "JOHN
DOES" 1-6 and THE CITY OF NEW YORK,,

14-CV-4861 (BMC)

Defendants.
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WHEREAS, plaintiffs commenced this action by filing a complaint on or about
August 14, 2014, alleging that the defendants violated plaintiffs' federal civil and state common
law rights;

WHEREAS, defendants have denied any and all liability arising out of plaintiffs'
allegations; and

WHEREAS, on January 26, 2015, plaintiffs accepted Offers of Judgment served
by defendants pursuant to Fed. R. Civ. P. 68 on November 14, 2014; and

WHEREAS, plaintiffs' claims were thereafter resolved pursuant to the
Stipulation of Settlement executed on February 4, 2015; and

WHEREAS, pursuant to the February 4, 2015 Stipulation of Settlement, plaintiffs assigned their right to attorneys' fees, expenses, and costs to his attorney, Alan D. Levine, Esq.; and

WHEREAS, counsel for defendants, and counsel for plaintiffs now desire to resolve the issue of attorneys' fees, costs and expenses, without further proceedings; and

WHEREAS, this Stipulation and Order of Settlement of Attorney's Fees ("Stipulation") shall not be construed to be an admission of liability by any defendants, nor an admission that any of the allegations made by plaintiffs are true or that defendants in any way violated any rights guaranteed to plaintiffs by any constitutions, statutes, ordinances, rules or regulations of the United States, the States of New York, or any subdivision thereof; and

WHEREAS, this Stipulation shall not be admissible in, nor is it related to, any other litigation or settlement negotiations, and nothing contained herein shall be deemed to constitute a policy or practice of the City of New York;

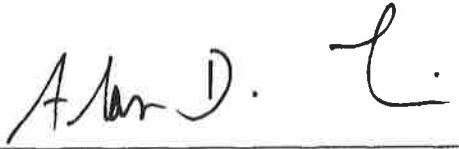
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, the attorneys of record for the respective parties to the above-captioned action, as follows:

1. Defendant City of New York shall pay to plaintiffs' counsel, Alan D. Levine, Esq., the sum total of **EIGHT THOUSAND AND FIVE HUNDRED DOLLARS (\$8,500.00)** in full satisfaction of plaintiffs' attorney's fees, expenses and costs. In consideration for the payment of this sum, plaintiffs' counsel does hereby release and discharge the defendants, their successors or assigns; and all past and present officials, employees, representatives and agents of the City of New York or any entity represented by the Office of the Corporation Counsel, from any and all claims of attorneys' fees, expenses and costs relating to this matter.

Dated: New York, New York
Feb. 4, 2015

ALAN D. LEVINE
Attorney for Plaintiffs
80-02 Kew Gardens Road, Suite 302
Kew Gardens, New York 11415

ZACHARY W. CARTER
Corporation Counsel of the
City of New York
*Attorney for Defendants City, Zummo,
Vallerugo, Connick, Hospedales, Perullo,
Rivera, Ripa, Stallone, Cruz, Kenny,
Post, Carbone, Gonzalez, Shimansky,
Shore and Vorraro*
100 Church Street
New York, New York 10007

By: 

Alan D. Levine
Attorney for Plaintiffs

By: 

Carolyn K. Depoian
Assistant Corporation Counsel

HON. BRIAN M. COGAN
UNITED STATES DISTRICT JUDGE

Dated: Feb. 4, 2015